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IP SOLUTIONS, INC.  
6

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION  
10

11 IP SOLUTIONS, INC.,	)	Case No. 07-CV-02774 JF (RS)
	)	
12 Plaintiff,	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER CONTINUING INITIAL</b>
13 vs.	)	<b>CASE MANAGEMENT</b>
	)	<b>CONFERENCE</b>
14 BANK OF AMERICA, N.A., <i>et al.</i> ,	)	
	)	
15 Defendants.	)	
	)	

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16  
17 TO THE COURT, TO ALL PARTIES, AND TO THE PARTIES' ATTORNEYS  
18 OF RECORD:

19 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, IP  
20 SOLUTIONS, INC. ("Plaintiff") and Defendants, BANK OF AMERICA, N.A. and BANK  
21 OF AMERICA TECHNOLOGY AND OPERATIONS, INC. ("Defendants") that the Case  
22 Management Conference be continued for one month from its presently-scheduled date of  
23 October 26, 2007, until after November 30, 2007, or to a later date that is convenient for  
24 the Court.  
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1 IT IS FURTHER HEREBY STIPULATED AND AGREED by and between  
2 Plaintiff and Defendants that, pursuant to this Stipulation continuing the Case Management  
3 Conference, the case schedule dates be modified as set forth in Exhibit A, attached hereto.  
4 Plaintiff and Defendants desire to pursue settlement opportunities in this matter and have  
5 scheduled a mediation for October 22, 2007 utilizing the services of a JAMS mediator.  
6

7 This Stipulation is therefore requested for good cause, namely, for the purposes of  
8 pursuing opportunities for settlement, and because Defendants' counsel has a trial  
9 scheduled to begin the week of November 26, 2007, and is not entered into for purposes of  
10 delay. The parties previously stipulated that Defendants be granted an additional fifteen  
11 (15) days in which to respond to Plaintiff's Complaint, up to July 27, 2007. The parties  
12 further stipulated that Defendants be granted an additional four (4) days in which to  
13 respond to Plaintiff's Complaint, up to July 31, 2007. In addition the parties stipulated that  
14 the original case management conference be continued for two months, from its originally-  
15 scheduled date of August 29, 2007. The Court issued an Order granting that continuance  
16 on August 27, 2007.  
17

18 By entering into this stipulation, neither Plaintiff nor Defendants waive any rights,  
19 claims or defenses they may have in this action. This Stipulation may be executed in  
20 counterparts and by facsimile signature, each of which, when executed, shall be an original  
21 and all of which together shall constitute one and the same stipulation. This Stipulation  
22 contains the entire agreement among the parties. The undersigned hereby consent to the  
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1 terms set forth in the foregoing Stipulation.

2 IT IS SO STIPULATED AND AGREED.

3  
4 Dated: \_\_\_\_\_ TRIAL & TECHNOLOGY LAW GROUP  
5 A Professional Corporation  
6 Attorneys for Plaintiff  
7 IP SOLUTIONS, INC.

8 By: \_\_\_\_\_  
9 Robert A. Spanner

10 Dated: \_\_\_\_\_ FISH & RICHARDSON, P.C.  
11 Attorneys for Defendants  
12 BANK OF AMERICA, N.A. and BANK OF  
13 AMERICA TECHNOLOGY AND OPERATIONS,  
14 INC.

15 By: \_\_\_\_\_  
16 Christina D. Jordan

17 **DECLARATION OF CONSENT**

18 Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under  
19 penalty of perjury that concurrence in the filing of this document has been obtained from  
20 Christina D. Jordan.

21 Dated: \_\_\_\_\_ TRIAL & TECHNOLOGY LAW GROUP  
22 A Professional Corporation  
23 Attorneys for Plaintiff  
24 IP SOLUTIONS, INC.

25 By: \_\_\_\_\_  
26 Robert A. Spanner

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE JEREMY FOGEL JUDGE OF THE  
UNITED STATES DISTRICT COURT